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May 28, 2025

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VIA ECF

**MEMO ENDORSED**

Honorable Jeannette A. Vargas  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Joint Letter-Motion to Extend Deadlines Relating to Defendant Changpeng Zhao's Time to Respond to Amended Complaint—*Troell, et al. v. Binance Holdings Ltd., et al.*, No. 1:24-cv-07136 (JAV)

Dear Judge Vargas,

Defendant Changpeng Zhao and Plaintiffs write jointly pursuant to Local Civil Rule 7.1(e) and Your Honor's Individual Rule 3(E) to respectfully move this Court for a short extension of time related to the briefing schedule for Mr. Zhao's anticipated motion to dismiss Plaintiffs' Amended Complaint ("MTD").

The current deadline for Mr. Zhao's MTD is June 10, 2025, and the new date requested is two weeks later, through and including June 24, 2025. Plaintiffs consent to Mr. Zhao's requested extension so long as they, too, receive a reciprocal two-week extension of time to respond to Mr. Zhao's MTD. The current deadline for Plaintiffs' brief in opposition to the MTD is two weeks after Mr. Zhao files his MTD, and the new date requested is four weeks after Mr. Zhao files his MTD. The current deadline for Mr. Zhao's reply in support of his MTD is seven days following Plaintiffs' response, and the new date requested is fourteen days following Plaintiffs' response.

This is Mr. Zhao's first request for an extension of time regarding the MTD and for an extension of time regarding his reply brief in support of the MTD. This is Plaintiffs' first request for an extension of time regarding their opposition to the MTD.<sup>1</sup>

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<sup>1</sup> In addition, Plaintiffs and Mr. Zhao have each previously filed a request for extension of time in connection with filings unrelated to this MTD. *See* ECF No. 42 (Plaintiffs' Joint Letter Motion for Extension of Time and Adjustment to the Entity Defendants' Motion to Dismiss Briefing Schedule); ECF No. 52 (Mr. Zhao's Letter Motion

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There is good cause considering the complexity of the case, and requests for extension of time to file motions to dismiss filed by other defendants in this matter were granted. *See, e.g.*, ECF No. 40 (granting extension of four weeks); ECF No. 43.

The parties are next scheduled to appear before the Court for a status conference on July 14, 2025. ECF No. 100. The parties do not expect that their requested extensions will affect any other deadlines in the case, nor do they intend such an outcome.

In making this request, Mr. Zhao reserves all its defenses and objections, including as to jurisdiction.

Accordingly, Mr. Zhao and Plaintiffs respectfully request that the Court extend the briefing deadlines for the parties as follows:

June 24, 2025: Mr. Zhao's Motion to Dismiss

July 22, 2025: Plaintiffs' Opposition to Mr. Zhao's Motion to Dismiss

August 5, 2025: Mr. Zhao's Reply in further support of his Motion to Dismiss

Thank you for your consideration of this matter.

Sincerely,

/s/ Katherine L. McKnight

Katherine L. McKnight  
BakerHostetler LLP

*Counsel to Defendant Changpeng Zhao*

/s/ Matthew J. Fisher

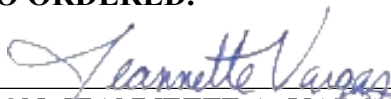
Matthew J. Fisher  
Sparacino PLLC

*Counsel for Plaintiffs*

The parties' request to extend the briefing deadlines for Defendant Zhao's Motion to Dismiss is **GRANTED**. Defendant Zhao's Motion to Dismiss shall be due by June 24, 2025. Plaintiffs' Opposition to the Motion to Dismiss shall be due by July 22, 2025, and Defendant Zhao's Reply shall be due by August 5, 2025. The Clerk of the Court is respectfully directed to terminate ECF No. 101.

**SO ORDERED.**

DATE: May 28, 2025

  
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HON. JEANNETTE A. VARGAS  
UNITED STATES DISTRICT JUDGE

for Extension of Time to Respond to Plaintiffs' Motion for Leave to Serve Mr. Zhao by Alternate Means). The Court granted both requests. *See also* ECF Nos. 43, 54 (each granting these requests).